

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE CEMENT MASONS	)	
PENSION FUND, LOCAL 502; TRUSTEES	)	
OF THE CEMENT MASONS INSTITUTE OF	)	
CHICAGO, ILLINOIS; TRUSTEES OF THE	)	
CEMENT MASONS SAVINGS FUND, LOCAL	)	
502; and TRUSTEES OF THE CEMENT MASONS)	)	
APPRENTICE EDUCATION AND TRAINING	)	
FUND, LOCAL 502,	)	
	)	
Plaintiffs	)	
	)	No. 08 C 1366
v.	)	
	)	Judge Shadur
ALKAT CONSTRUCTION SERVICES, INC.,	)	
	)	Magistrate Judge Schenkier
	)	
Defendant.	)	

**MOTION FOR ORDER OF DEFAULT AND AUDIT**

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ and ARNOLD and KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter an Order of Default as to liability in favor of Plaintiffs and against Defendant, ALKAT CONSTRUCTION SERVICES, INC.

In support thereof, Plaintiffs state:

1. This case was filed on March 7, 2008.
2. Defendant was served with Summons and Complaint on March 14, 2008 as shown on the return of service previously filed.
3. In excess of 20 days have expired since Service of Process, however, Defendant has failed to file an answer or otherwise plead.

**WHEREFORE**, Plaintiffs move this Court to:

1. Enter an Order of Default against Defendant.

2. Order Defendant to submit its records for an audit for the period June 16, 2006 through present.

**TRUSTEES OF THE CEMENT  
MASONS PENSION FUND, LOCAL  
502, et. al.**

By: s/ Donald D. Schwartz  
One of Its Attorneys

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